

ATTACHMENT “B”-STATEMENT OF BASIS

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT PERMIT No. F-01-032
MURAKAMI MANUFACTURING USA, INC.
575 WATER TOWER BYPASS, CAMPBELLISVILLE, KENTUCKY
AUGUST 18, 2001
FROUGH SHERWANI, REVIEWER
PLANT I.D. # 021-217-00039
APPLICATION LOG # 53985

SOURCE DESCRIPTION:

The Murakami manufacturing USA, Inc. is located at Campbellsville Kentucky, manufactures mirror housings for the automotive industry.

Emission Point	01(PC1)	Spray Booth
	MP1	Primer Coat
	MP2	Clean Up

MP1:

This point is for primer coat application. The “PTE” is based on 6.34 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2

This point is for clean up solvent. The consumption of solvent is 0.021 gallons per day. The “PTE” is based on 8760 hrs per year.

Emission Point	02(BC1)	Electrostatic Spray Booth
	MP1	Base Coat
	MP2	Clean Up

MP1

This point is for Base Coat. The “PTE” is based on 21.4 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2

This point is for clean up solvent. The consumption of solvent is 0.021 gallons per day. The “PTE” is based on 8760 hrs per year

Emission Point 03(CC1) Spray Booth

MP1 Clear Coat
MP2 Clean Up

MP1:

This point is for clear coat. The “PTE” is based on 21.4 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2

This point is for clean up solvent. The consumption of solvent is 0.021 gallons per day. The “PTE” is based on 8760 hrs per year

Emission Point 04(CD1) Conductive Coating Booth

MP1 Conductive Coating
MP2 Clean Up

MP1:

This point is for conductive coating. The “PTE” is based on 0.16 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2

This point is for clean up solvent. The consumption of solvent is 0.021 gallons per day. The “PTE” is based on 8760 hrs per year

Emission Point 05(CO1) Curing Oven

This point is for curing oven. Natural gas is used as a fuel. The rated capacity of the oven is 1.0 mmBTU/hr. This is an insignificant activity.

Emission Point 06(AMU1) Air make up Unit

This point is for air make up unit. Natural gas is used as a fuel. The rated capacity of the unit is 4.0 mmBTU/hr. This is an insignificant activity.

Emission Point 07(AO1) Annealing Oven

This point is for oven. Natural gas is used as a fuel. The rated capacity of the unit is 0.5 mmBTU/hr. This is an insignificant activity.

Emission Point	08	Plastic Molding Machine
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This point is for molding machine. The rated capacity of the machine is 460 ton. This is an insignificant activity.

Emission Point	09	Plastic Molding Machine
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This point is for molding machine. The rated capacity of the machine is 360 ton. This is an insignificant activity.

Emission Point	10	Plastic Molding Machine
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This point is for molding machine. The rated capacity of the machine is 80 ton. This is an insignificant activity.

Emission Point	11	Mold Release
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This point is for mold release. The consumption of the agent is 10 gallons/year. This is an insignificant activity.

Emission Point	12	Lubricant Spray
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This point is for mold release. The consumption of the agent is 5 gallons/year. This is an insignificant activity.

Emission Point	13	Space Heaters
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This point is for space heater. Natural gas is used as a fuel. This is an insignificant activity.

COMMENTS:**Type of control and efficiency:**

Emission points 01, 02,03 and 04 have water wall to control particulate matter. The control efficiency of the water wall is assumed to be 95 %.

Emission factors and their source:

AP -42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

Applicable regulation:

State regulation 401 KAR 59:010, New process operations, applies to these emissions points because these are process operations that were commenced after July 2, 1975.

State regulation 401 KAR 52:030 Federally-enforceable permits for non-major sources.

EMISSION AND OPERATING CAPS DESCRIPTION:

The actual emissions of HAPS for a single pollutant shall not exceed 9.5 tons per year. The combined emissions for HAPs shall not exceed 23.75 tons per year. The actual VOC emissions shall not exceed 95.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.